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October 23, 2024

By ECF

Magistrate Judge Lois Bloom
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Gov't Emps. Ins. Co., et al. v. Tristate Psychological Injury Services, P.C., et al.*
Docket No. 1:23-cv-04091-RER-LB
RR File No.: 005100-03727

Dear Magistrate Judge Bloom:

This firm represents Plaintiffs (collectively, “Plaintiffs” or “GEICO”) in the above referenced matter. Jointly with the appearing Defendants Nazim Tariverdiev, Kianan Tariverdiev, Vladislav Stoyanovsky, Dmitriy Khavko, Dilshod Islamov, Eduard Pakoys, and Financial Vision Capital Group II LLC (collectively, “Defendants”, and together with Plaintiffs, the “Parties”), we respectfully submit this letter motion seeking to have the Court, under Fed. R. Civ. P. 60(a), correct the record.

As discussed during the Status Conference on October 17, 2024, the Parties indicated the need for certain changes to the record to correct minor errors in the Amended Complaint. Specifically, the changes relate to the fact that Defendant Financial Vision Capital Group II LLC (“Financial Vision”) does not have a f/k/a designation, is a New York based company (not a New Jersey limited liability company) and is a separate entity than the one named as a defendant in Gov’t Emps. Ins. Co. v. Harbor Medical Group, P.C., 2:23-cv-09038-NVM-AYS. Accordingly, the Parties have attached a proposed Order, under Fed. R. Civ. P. 60(a) directing the clerk to make specific minor changes to the caption and the Amended Complaint.

The Parties respectfully request that the Court issue an Order consistent with the attached proposal. We thank the Court for its attention to this matter.

Very truly yours,

RIVKIN RADLER LLP

/s/ Michael Vanunu

Michael Vanunu

Encl.

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